

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ANA CERVANTES, individually and on	)	
behalf of all others similarly situated,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION
	)	FILE NO. 1:17-cv-02410-ELR
UNITED PARCEL SERVICE OF	)	
AMERICA, INC.,	)	
	)	
Defendant.	)	

**JOINT MOTION TO STAY DEADLINES**

Plaintiff Ana Cervantes and Defendant United Parcel Service of America, Inc. jointly report that they have reached a confidential agreement in principle to settle this case on an individual basis. Accordingly, the parties jointly move the Court to enter an order staying all case deadlines—including, without limitation, further briefing on Defendant’s motion to dismiss, the Rule 26(f) conference, the joint preliminary report and discovery plan, initial disclosures, the deadline for moving for class certification, and the beginning of discovery—for three weeks so that the parties may finalize a settlement agreement and file a stipulation of dismissal with prejudice. The parties have not sought or received a previous stay of deadlines in this case. A Proposed Order is attached hereto as Exhibit A.

Submitted this 22nd day of September, 2017.

s/ (by Frank M. Lowrey IV with express  
permission)

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**CERTIFICATE OF COMPLIANCE**

I certify that the foregoing **JOINT MOTION TO STAY DEADLINES** has been prepared using Times New Roman 14 point font, which is one of the font and point selections approved by the Court in Local Rule 5.1B.

/s/ Frank M. Lowrey IV  
Frank M. Lowrey IV

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of September, 2017, I electronically filed the foregoing **JOINT MOTION TO STAY DEADLINES** with the Clerk of the United States District Court, Northern District of Georgia, using the CM/ECF system, which shall send notification of such filing to counsel of record as follows:

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